

EXHIBIT G

Exhibit G: Defendants' and Intervenors' Deposition Designations

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(A) and the Joint Motion for Leave to Amend Docket Control Order Defendants AT&T Mobility LLC, Sprint/United Management Company, T-Mobile USA, Inc., and Cellco Partnership d/b/a Verizon Wireless (“Defendants”) and Intervenors HTC Corporation and HTC America, Inc. (“Intervenors”) hereby serve their affirmative designations of those witnesses whose testimony Defendant may present at trial by means of deposition for issues in which Defendant holds the burden of proof.

Defendants and Intervenors serve these deposition designations subject to and without waiver of their motions *in limine*, motions to exclude certain evidence, *Daubert* motions, and challenges to experts. Defendants and Intervenors reserve the right to modify, amend, or supplement these designations in response to rulings by the Court (including on any motions). Defendants and Intervenors also reserve the right to present deposition testimony from any witness designated by Plaintiff for purposes of impeachment or during the examination of its expert witnesses.

Deposition of Robert L. Meyers – December 21, 2017				
Defendants' and Intervenor' Initial Designations	Salazar's Objections	Salazar's Counter Designations	Defendants' and Intervenors' Objections to Salazar's Counter-Designations	Court Ruling
4:7-14	BSD, 401/402, 802			
5:11-17	BSD, 401/402, 802			
7:8-23	BSD, 401/402, 802			
8:20-9:1	BSD, 401/402, 802			
11:25-12:10	BSD, 401/402, 802			
17:12-20	BSD, 401/402, 802			
18:5-14	BSD, 401/402, 802			
22:11-23:5	BSD, 401/402, 802, S, VA, 602P, 602F			
23:17-19	BSD, 401/402, 802, S, VA, 602P, 602F			
24:13-25:5	BSD, 401/402, 802, S, VA, 602P, 602F			
31:20-32:25	BSD, 401/402, 802, S, VA, 602P, 602F, 701, 702	30:25-33:17		

Deposition of Joe Andrew Salazar – December 20, 2017				
Defendants' and Intervenors' Initial Designations	Salazar's Objections	Salazar's CounterDesignations	Defendants' and Intervenors' Objections to Salazar's Counter-Designations	Court Ruling
4:7-12	BSD, 401/402, 802			
8:6-10	BSD, 401/402, 802			
9:13-15:22	BSD, 401/402, 802			
30:6-7	BSD, 401/402, 802			
30:15-18	BSD, 401/402, 802, LC			
30:20-23	BSD, 401/402, 802, LC			
30:25-31:4	BSD, 401/402, 802, LC			
42:6-7	BSD, 401/402, 802, 602F, VA,701, 702			
42:9	BSD, 401/402, 802, 602F, VA,701, 702			
43:5-6	BSD, 401/402, 802, 602F, VA,701, 702			

43:8-11	BSD, 401/402, 802, 602F, VA,701, 702			
55:1-56:19	BSD, 401/402, 802, 602F, VA,701, 702, 403M, 602P, LC			
62:18-63:12	BSD, 401/402, 802, 602F, VA,701, 702, 602P			
63:10-11	BSD, 401/402, 802, 602F, VA,701, 702			
63:14	BSD, 401/402, 802, 602F, VA,701, 702			
64:3-8	BSD, 401/402, 802, COM, VA			
74:15-19	BSD, 401/402, 802, 602F, VA,701, 702			
74:23-75:10	BSD, 401/402, 802, 602F, VA,701, 702			
75:15-21	BSD, 401/402, 802, 602F, VA,701, 702			
94:12-15	BSD, 401/402, 802, 602F, VA,701, 702			
95:8-11	BSD, 401/402, 802, 602F, VA,701, 702			

95:20-96:18	BSD, 401/402, 802, 602F, VA,701, 702			
97:3-5	BSD, 401/402, 802, 602F, VA,701, 702			
97:7-10	BSD, 401/402, 802, LC			
100:10-17	BSD, 401/402, 802, LC			
100:21-24	BSD, 401/402, 802			
101:17-22	BSD, 401/402, 802			
110:24-111:2	BSD, 401/402, 802, LC, MIS, H, 602P, 602F			
111:4-8	BSD, 401/402, 802, LC, MIS, H, 602P, 602F, PRIV			
111:11-20	BSD, 401/402, 802, LC, MIS, H, 602P, 602F, PRIV			
112:2-4	BSD, 401/402, 802, LC, MIS, H, 602P, 602F, PRIV			
112:6-7	BSD, 401/402, 802, LC, MIS, H, 602P, 602F, PRIV			

132:8-23	BSD, 401/402, 802, R, VA, 602P, LC			
----------	---------------------------------------	--	--	--

Deposition of Joe Andrew Salazar – September 22, 2020				
Defendants' and Intervenors' Initial Designations	Salazar's Objections	Salazar's Counter Designations	Defendants' and Intervenors' Objections to Salazar's Counter-Designations	Court Ruling
7:7-11	401/402, 403P, 403M			
8:5-9:2	401/402, 403P, 403M			
9:16-21	401/402			
10:15-24	401/402, VA			
11:2-7				
11:12-23	401/402			
13:8-22	401/402			
14:1-11	401/402, 403P, 403M			
14:14-16:4	401/402, 403P, 403M, S, VA			
17:6-15	401/402			
18:13-19:13	401/402, 403P, 403M			
19:18-21	401/402, 403P, 403M			
19:24-21:2	401/402, 403P, 403M			
23:13-18	401/402			

23:23-25				
24:15-25:5	401/402, 403P, 403M			
33:7-11	401/402, 403P, 403M			
49:13-25	401/402			
50:1-5	401/402, 403P, 403M, VA	50:6-15		
50:16-51:5	401/402, 403P, 403M			
51:11-52:15	401/402, 403P, 403M			
52:22-53:15	401/402, 403P, 403M			
54:16-22	401/402			
55:11-16	401/402, 403P, 403M			
56:2-57:5	401/402, 403P, 403M, 802, LC	57:6-10		
57:7-58:14	401/402, 403P, 403M, 802, LC, VA			
59:2-17	401/402, VA			
60:19-62:11	401/402, 403M	60:9-18		
62:14-19	401/402, 403M, LC			
63:5-15	401/402, 403M, LC	60:9-18		
110:21-111:20	DNE			

Deposition of Sivasubramanian Muthukumarasamy – January 8, 2018				
Defendants' and Intervenors' Initial Designations	Salazar's Objections	Salazar's Counter Designations	Defendants' and Intervenors' Objections to Salazar's Counter-Designations	Court Ruling
8:14-23				
9:2-9				
14:16-15:25				
14:16-15:25				
16:6-18:3				
27:2-3				
27:5-20				
28:5-11				
28:13-16				

KEY	SALAZAR'S OBJECTIONS TO HTC'S DEPOSITION DESIGNATION
106	Optional completeness required to put statement in proper context
401/402	Lacks relevance
403P	Prejudice outweighs relevance
403M	Evidence could mislead jury or confuse issues
403C	Cumulative evidence
408	Settlement communications
602F	Lacks proper foundation
602P	Witness lacks personal knowledge
701/702	Improper or unreliable opinion testimony
703	Inadmissible evidence disclosed as basis for expert opinion
802	Hearsay
805	Hearsay within hearsay
901	Lacks authenticity
MIL	Subject to motion in limine
ARG	Scope/Form: Argumentative
AF	Scope/Form: Assumes facts not in evidence
COM	Scope/Form: Compound
MIS	Scope/Form: Misquoting/mischaracterizing prior testimony
NAR	Scope/Form: Narrative
NR	Scope/Form: Non-responsive
S	Scope/Form: Speculation
LQ	Scope/Form: Leading question
LC	Scope/Form: Legal conclusion
PRIV	Scope/Form: Privileged
R	Scope/Form: Repetitive/asked and answered
IP	Scope/Form: Improper Impeachment
VA	Scope/Form: Vague/Ambiguous

ATTNY	Attorney objections, side-bar remarks or argument not removed
PER	Testimony by 30(b)(6) designee outside scope of noticed topics
BSD	Beyond scope of discovery order
DNE	Cited lines do not exist

-2-